



THE CITY OF NEW YORK
LAW DEPARTMENT

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August 11, 2025

The request is granted.

VIA ECF

Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

August 12, 2025

Re: William Perry v. Mark Monaco, et al.,
24 Civ. 8736 (LJL) (RFT)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York and the attorney representing defendants the City of New York, Alvin Bragg, Mark Monaco, Lisa Del Pizzo, Stuart Silberg, Erin Tierney, Shira Arnov, Alex Wynne, Hannah Perlman, Thomas Mullen, and Donjya Bardliving (collectively, “defendants”) in the above-referenced matter. Defendants write to respectfully request that defendants’ deadline to file their anticipated motion to dismiss the operative Complaint be held in abeyance until such time that the plaintiff’s anticipated motion to amend his Complaint is adjudicated. This is defendants’ first such request. Plaintiff *pro se* William Perry consents to this request.

On July 21, 2025, the Court granted defendants’ request for an extension of time to file their anticipated motion to dismiss the Amended Complaint, from July 23, 2025 until August 13, 2025. See ECF 85. On July 29, 2025, plaintiff requested, *inter alia*, leave to file a Second Amended Complaint. See ECF 91. In response to plaintiff’s request, on August 7, 2025, the Court ordered plaintiff to file a motion to supplement the Amended Complaint pursuant to Rule 15(d) of the Federal Rules of Civil Procedure. See ECF 92.

Although defendants are prepared to file their motion papers by August 13, 2025, in light of the Court’s August 7, 2025 Order, defendants respectfully request that the Court hold defendants’ deadline to file their anticipated motion to dismiss the Amended Complaint in

abeyance, until such time that plaintiff's anticipated motion to supplement and/or amend the Complaint is adjudicated. Additionally, defendants respectfully request that the Court permit the parties to submit a revised proposed briefing schedule for defendants' motion to dismiss the operative complaint within one week of the Court's adjudication of plaintiff's motion to amend.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Jonathan Hutchinson

Jonathan Hutchinson

Senior Counsel

Special Federal Litigation Division

cc: **VIA ECF**
William Perry
Plaintiff pro se